

IN THE UNITED STATES DISTRICT
COURT EASTERN DISTRICT OF
PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYER'S
CONCUSSION LITIGATION

Case No.: 2:12-md-02323-AB

Hon. Anita B. Brody

THIS DOCUMENT RELATES TO:

NOTICE OF ATTORNEY'S LIEN

Plaintiffs Master Administrative Long
Form Complaint and:

Plaintiff: Phillip Dillard

Attorney John W. Lorentz, and The Lorentz Law Firm, P.A., attorney(s) for Plaintiff, **Phillip Dillard** in the above-entitled action, hereby notify this Court and all parties that they have a lien in this case for reasonable contingent attorney's fees plus reimbursement for legitimate case costs and expenses as set forth in the accompanying Petition to Establish Attorney's Lien relating to Plaintiff, **Phillip Dillard**.

Dated: August 22, 2023

/S/ John W. Lorentz

John W. Lorentz, Esq. (#0276763)

The Lorentz Law Firm, PA

398 Snow Drive

Fort Myers, FL 33919

Office: (651) 483-4400

Cell: (651) 329-7321

Fax: (651) 204-0065

John@LorentzLaw.com

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing *Notice of Attorney's Lien* to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Eastern District of Pennsylvania on all parties registered for CM/ECF in the litigation.

Dated: August 22, 2023

/s/ John W. Lorentz

John W. Lorentz

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Case No.: 2:12-md-02323-AB

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THIS DOCUMENT RELATES TO:

**PETITION TO ESTABLISH
ATTORNEY’S LIEN**

Plaintiffs Master Administrative Long
Form Complaint and:

Plaintiff: Phillip Dillard

COMES now the Petitioner, John W. Lorentz, Esquire, for The Lorentz Law Firm, P.A., (“Lorentz”) pursuant to a fully executed and binding retainer agreement state:

1. On or about July 7, 2017, Petitioner was retained and employed by the Plaintiff, **Phillip Dillard**, pursuant to a contingent fee agreement, to pursue a claim for injuries and damages caused by the National Football League’s and all other responsible parties’ liability for former and/or retired NFL players’ long- term brain injuries and other head injuries and damages associated with football-related concussions, head and brain injuries i.e., The *In re: National Football League Players’ Concussion Injury Litigation* class action settlement.

2. The specifics of the agreement for legal services are as follows: If no recovery (by settlement or trial) is obtained, client will not owe a legal fee. If The Lorentz Law Firm P.A., obtains a settlement or judgment for Client, Client will pay to the Petitioner fifteen percent plus expenses and the common benefit fee for a level 1.5, and ten percent plus the common benefit fee from the gross award along with the reimbursement of expenses. Pursuant to the Court's Order of April 5, 2018 the Petitioner adopted the cap on attorney's fees of twenty-two percent (22%).

3. When Petitioner entered the contract with Plaintiff, Petitioner entered into the risk and expense of the litigation.

4. From the date the Petitioners were authorized to proceed on behalf of the Plaintiff, the Petitioners have actively and diligently investigated, prepared, and pursued Plaintiff's claims, and has taken all steps necessary to prosecute those claims, including, but not limited to, correspondence and communications with the client, preparation and review of client's factual and legal circumstances, providing client updates, analyzing Plaintiff's medical status and need for medical testing, etc.

5. Petitioners were not terminated due to any good cause, malfeasance, or other improper action.

6. The Petitioners claims the right to have a lien for attorney's fees and

expenses established and enforced upon any sums to be derived from any settlement or judgment obtained or to be obtained by Plaintiff in this action.

WHEREFORE, the Petitioners prays:

1. That an attorney's lien be established;
2. That the amount of the lien be determined;
3. That the Court order that Petitioner be entitled to enforce an attorney's lien against the proceeds to be derived from any settlement or judgment in this action;
4. That the Defendant or the Defendant's insurer be prohibited from paying to the Plaintiff any sums of money until said lien has been satisfied; and;
5. For such other further relief as this Court deems just.

Dated: August 22, 2023

/S/ John W. Lorentz

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CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing *Petition to Establish Attorney's Fees* to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Eastern District of Pennsylvania on all parties registered for CM/ECF in the litigation.

Dated: August 22, 2023

/s/ John W. Lorentz

John W. Lorentz